

REMARKS

Claims 1-28 are pending.

Claims 1-28 stand rejected.

Claims 1, 8, 15, 20, and 22 have been amended to correct minor grammatical errors and not for reasons of patentability.

Claim Rejections - 35 U.S.C. § 102

Claims 1-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,395 issued to Hyman (referred to herein as “*Hyman*”). Applicants respectfully traverse the rejection.

Hyman relates to a “self-modifying data flow architecture for computer-readable structures, such as markup language, modeled as a network of interconnected processing elements, each having a data input and a transformation input.” *Hyman*, Abstract. In col. 3, lines 20-32, *Hyman* describes the basic elements of the architecture. Specifically, *Hyman* teaches that:

An exemplary implementation of the architecture according to the invention includes a network of processing elements defined by an XML tree. An XML input tree structure is used to define the data flow relationships between processing elements. Within the input tree, processing elements are defined by appropriate tags, recognized by an execution engine according to another aspect of the invention. Transformation input elements, according to this exemplary implementation, are provided in the form of XSL trees, and data input elements are provided in the form of XML trees. Each processing element therefore generates an output tree, in the form of an XML tree, which is constructed by applying the XSL transformation input to the XML data input. *Id.*, col. 3, lines 20-32.

Hyman continues by teaching in col. 3, lines.33-35 that the “Nesting of processing elements within the input tree provides for the use of an output tree of one processing element as an input to another processing element.” Thus, although *Hyman* teaches the use of nested process elements, *Hyman* fails to teach or suggest the invention of claims 1, 8, and 22, which recite “performing a first transformation of said framework to generate a first set of rules relating

to interpretation of said first grammar level” and “performing a second transformation of said framework to generate a first presentation style for said first grammar level.” Thus, unlike the teachings and suggestions of *Hyman*, claims 1, 8, and 22 significantly recite performing first and second transformations on *the same framework* with different generation outputs so that “an output in a second grammar [can be] understood by an application’s parser.”

Claim 1 of *Hyman* clearly emphasizes the significant difference between the teachings of *Hyman* and the present invention of claims 1, 8, and 22. Claim 1 of *Hyman* illustrates the nesting aspects of the *Hyman* taught architecture. Claim 1 of *Hyman* states in relevant part:

at least first and second processing elements;

the first processing element having a first data input and a first transformation input and generating a first output by applying a transformation represented by the first transformation input to the data represented by the first data input;

the second processing element having a second data input and a second transformation input and generating a second output; [and]

the first output being provided as one of the second data input or the second transformation input.

Thus, *Hyman* clearly contrasts with “performing a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level” and “performing a second transformation of said framework to generate a first presentation style for said first grammar level” as required by claims 1, 8, and 22 of the present application.

Applicants respectfully submit that the present invention of claim 15 is allowable for at least the same reasons as independent claims 1, 8, and 22. In contrast to the teachings and suggestions of *Hyman*, claim 15 recites in relevant part:

said computer program code configured to cause a computer to:

perform a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level;

perform a second transformation of said framework to generate a first presentation style for said first grammar level;

obtain a user defined input in said first grammar, said user defined input conforming to said first set of rules;

apply said first set of rules and said first presentation style to said user defined input to generate an output in said document, said output conforming to a second grammar level understood by an application's parser. (emphasis added).

In light of the above remarks, Applicants respectfully submit that independent claims 1, 8, 15, and 22 are allowable over the teachings and suggestions of *Hyman*.

Applicants also respectfully submit that the dependent claims are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Accordingly, Applicants respectfully request withdrawal of the rejection.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, COMMISSIONER FOR PATENTS, P.O. Box 1450, Alexandria, VA 22313-1450 on February 22, 2005.

 2-22-2005
Attorney for Applicant(s) Date of Signature

Respectfully submitted,



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